# CENTRAL FAX CENTER

FEB 2 6 2007

Docket No.: 60,130-899

00MRA0028

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Appellant:

Maass, et al.

Group Art Unit:

3634

Serial No.:

09/672,393

Examiner:

Redman, Jerry

Filed:

September 28, 2000

Title:

MOTOR VEHICLE DOOR

#### REPLY BRIEF

Commissioner of Patents P.O. Box 1450 Alexandria, VA 22313-1450

#### Dear Sir:

This is in reply to the Examiner's Answer mailed December 28, 2006. The Examiner's Answer raises two arguments which require some brief response.

### Claim 10

Szerdahelyi does not disclose an access opening formed at a free edge of an interior sheet metal as claimed. The Examiner is calling the cutout opening 10 the access opening and the interior door panel 1b and the module support 3 the interior sheet metal. The module support 3 closes the cutout opening 10 in the inner door panel 1b. However, the cutout opening 10 is not formed at a free edge of the interior door panel 1b. Instead, the cutout opening 10 is formed in a central portion of the interior door panel 1b. The central portion of the interior door panel 1b is not located at the edge of the vehicle door and is certainly not located at the free edge of the vehicle door.

Szerdahelyi also does not disclose a carrier module including a base plate that closes an opening in an interior sheet metal from inside a hollow interior space formed between the interior sheet metal and an exterior sheeting as claimed. The Examiner is calling the functional units 5 and 6 the carrier module and the assembly openings 3a and 3b the opening. Szerdahelyi disclose a vehicle door including functional units 5 and 6 that are received in the assembly openings 3a and 3b of the module support 3. The module support 3 closes an opening 10 in an inner door panel 1b. An interior space is defined between the inner door panel 1b and an outer door panel 1a. The functional units 5 and 6 close the openings 3a and 3b in the module support 3 from outside the interior

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space, not from inside the interior space as claimed. As shown in Figure 1c, the seals 51 and 61 around the inner perimeter of the functional units 5 and 6 face into the page. Therefore, the functional units 5 and 6 are received in the openings 3a and 3b in a direction towards the page, which is outside the interior space. Szerdahelyi does not disclose that the functional units 5 and 6 close the opening 10 from inside a hollow interior space as claimed.

#### Claim 27

Szerdahelyi does not disclose a carrier module that carriers a window lift mechanism that closes an opening of a closing plate, and the closing plate closes an access opening as claimed. In Szerdahelyi, a window lift mechanism 31 is mounted to a module support 3 (column 3, lines 36 to 38). Functional units 5 and 6, which the Examiner is calling the carrier module, are also assembled on the module support 3. The window lift mechanism 31 is not carried by the functional units 5 and 6, but is rather carried by the module support 3. The functional units 5 and 6 do not carry the window lift mechanism 31. Szerdahelyi does not disclose a carrier module that carriers a window lift mechanism that closes an opening of a closing plate, and the closing plate closes an access opening as claimed.

#### **CLOSING**

For the reasons set forth above, and for the reasons set forth in the main brief, the rejection must be reversed.

Respectfully Submitted,

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<u>CERTIFICATE OF FACSIMILE</u>
I hereby certify that this reply brief is being facsimile transmitted to the United States Patent and Trademark Office, 571-273-8300 on February 26, 2007.

Amy M. Spaulding